

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:

DEBORAH J. SINATRA,	:	Chapter 13
d/b/a DEBORAH SINATRA INTERIORS	:	
Debtor(s)	:	
	:	
WILMINGTON SAVINGS FUND	:	Case No: 5-20-00301-MJC
SOCIETY, FSB, d/b/a CHRISTIANA	:	
TRUST, NOT INDIVIDUALLY BUT AS	:	
TRUSTEE FOR PRETIUM MORTGAGE	:	
ACQUISITION TRUST	:	
Movant(s)	:	
vs.	:	
	:	
DEBORAH J. SINATRA,	:	
d/b/a DEBORAH SINATRA INTERIORS	:	
and JACK N. ZAHAROPOULOS (Trustee)	:	
Respondent(s)	:	

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**DEBTOR'S MOTION TO RECONSIDER ORDER GRANTING RELIEF FROM THE
AUTOMATIC STAY TO WILMINGTON SAVINGS FUND SOCIETY, FSB, d/b/a
CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR PRETIUM
MORTGAGE ACQUISITION TRUST**

AND NOW COMES, Deborah J. Sinatra, d/b/a Deborah Sinatra Interiors, by and
through her attorney, Kimberly D. Martin, and files this Response as follows:

1. That on or about August 3, 2021, Movant filed a Certificate of Default with the Court alleging that the Debtors were in default of the Stipulation approved by the Court on September 28, 2020.
2. That on or about August 18, 2021, an Order Modifying Automatic Stay was entered by the Court.
3. That Debtor believes and therefore avers that she is not in default of the Stipulation in that all payments have been made in a timely manner as directed in the Stipulation.

to Rushmore Loan Management Services P.O. Box 55004, Irvine, CA 92619.

4. That Debtor believes and therefore avers that the Automatic Stay should be reinstated.

WHEREFORE, Deborah J. Sinatra, Debtor, respectfully request this Honorable Court reconsider the Order Modifying Automatic Stay, reinstate the Automatic Stay and for such other and further relief as the Court deems just and proper.

Dated: 08/18/2021

Respectfully Submitted,

_____/s/_____
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